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15 Attorneys for Defendant: *Otto Trucking LLC*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

WAYMO LLC.

Plaintiff,

v_a

21 UBER TECHNOLOGIES, INC.;
22 OTTOMOTTO LLC; OTTO TRUCKING
LLC

Defendants

Case No. 3:17-cv-00939-WHA

**[PROPOSED] ORDER GRANTING
DEFENDANT OTTO TRUCKING'S
MOTION FOR RELIEF FROM NON-
DISPOSITIVE PRETRIAL ORDERS
(DOCKET NO. 1391)**

Courtroom: 8, 19th Floor
Judge: Honorable William Alsup
Trial Date: October 10, 2017

Filed/Lodged Concurrently with:
1. Declaration of Todd A. Boock
2. [Proposed] Order

1 Defendant Otto Trucking LLC (“Otto Trucking”) filed a Motion for Relief from Judge
2 Corley’s August 28, 2017 oral Minute Order re: Plaintiff Waymo LLC’s (“Waymo”) and non-
3 party Keker, Van Nest & Peters LLP’s (“KVN”) Motions to Quash Subpoena and KVN’s Motion
4 for Protective Order; and Order re Scope of Waymo’s Privilege Waiver (Docket (“Dkt.”) 1391).

5 FOR GOOD CAUSE SHOWN, the Court orders as follows:

- 6 1. Magistrate Judge Corley’s August 28, 2017 Order as to Waymo’s and non-party
7 KVN’s Motions to Quash Subpoena and KVN’s Motion for Protective Order (Dkt.
8 1391) is vacated as to the documents sought by the subpoena, and is without prejudice
9 to Otto Trucking seeking further relief as to the deposition of KVN;
- 10 2. KVN is ordered to produce all responsive documents forthwith, but no later than
11 _____.
- 13 3. The scope of the privilege waiver referenced by the August 18, 2017 Order (Dkt. 1272)
14 includes Waymo’s entire 2016-17 investigation into the individuals contemplated by
15 the KVN memo identified at WAYMO-UBER-00086812 to -00086814.

16
17 **IT IS SO ORDERED.**

20 Dated: _____, 2017

21 _____
HON. WILLIAM H. ALSUP
UNITED STATES DISTRICT JUDGE